

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**MAX MOUSSAZADEH,**

*Plaintiff,*

*v.*

**TEXAS DEPARTMENT OF CRIMINAL  
JUSTICE, *et al.*,**

*Defendants.*

§

§

§

§ **Civil Action No. 3:07-CV-574**

§

§

§

§

**JOINT STIPULATION OF RULE 41(a) DISMISSAL**

TO THE HONORABLE JUDGE OF THE DISTRICT COURT:

Plaintiff Max Moussazadeh and Defendants Texas Department of Criminal Justice (“TDCJ”), Brad Livingston, and David Sweeten respectfully submit this joint stipulation of dismissal pursuant to Rule 41(a). Mr. Moussazadeh dismisses his claims in this lawsuit. Defendants have stipulated to the dismissal.

DATED: January 8, 2016

Respectfully submitted,

/s/ Anne W. Robinson

Anne W. Robinson (Attorney-In-Charge)

Matthew T. Murchison

Admitted *Pro Hac Vice*

LATHAM & WATKINS LLP

555 11th Street, NW, Suite 1000

Washington, DC 20004

Tel: 202-637-2200

Fax: 202-637-2201

anne.robinson@lw.com

matthew.murchison@lw.com

/s/ Luke Goodrich

Eric Rassbach

Texas Bar No. 24013375

Luke Goodrich

Admitted *Pro Hac Vice*

THE BECKET FUND FOR RELIGIOUS LIBERTY

3000 K Street, NW, Suite 220

Washington, DC 20007

Tel: 202-955-0095

Fax: 202-955-0090

erassbach@becketfund.org

lgoodrich@becketfund.org

*Attorneys for Plaintiff Max Moussazadeh*

Ken Paxton  
Attorney General of Texas

Charles E. Roy  
First Assistant Attorney General

James E. Davis  
Deputy Attorney General for Civil  
Litigation

Karen D. Matlock  
Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/ Celamaine Cunniff  
Celamaine Cunniff  
Attorney-In-Charge  
Assistant Attorney General  
Attorney General's Office  
State Bar No. 05231500  
Southern Dist. ID No. 30920

Office of the Attorney General  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548  
Tel: 512.463-2080  
Fax: 512.495-9139  
cela.cunniff@texasattorneygeneral.gov

*Attorneys for Defendants Texas Department  
of Criminal Justice, Livingston and Sweeten*

#### **NOTICE OF ELECTRONIC FILING**

I, Anne W. Robinson, do hereby certify that I have electronically submitted for filing a true and correct copy of the above and forgoing document in accordance with the Electronic Case Filing System of the Southern District of Texas, on January 8, 2016.

/s/ Anne W. Robinson  
Anne W. Robinson

**CERTIFICATE OF SERVICE**

I, Anne W. Robinson, do hereby certify that a true and correct copy of the above and foregoing document has been served on all attorneys of record, via the Electronic Case Filing System of the Southern District of Texas, on January 8, 2016.

/s/ Anne W. Robinson  
Anne W. Robinson